

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|---------------------------|---|------------------------|
| JOSEPH A. COCHRAN, JR., |) | |
| |) | |
| Plaintiff, |) | |
| |) | C.A. 06-697 JJF |
| v. |) | |
| |) | |
| J.B. HUNT TRANSPORT, INC. |) | |
| and JAMES W. REED, |) | TRIAL BY JURY DEMANDED |
| |) | |
| Defendants. |) | |

NOTICE OF DEPOSITIONS OF DEFENDANTS

TO: Delia A. Clark, Esquire
Rawle & Henderson LLP
300 Delaware Avenue, Suite 1015
Wilmington, DE 19801

PLEASE TAKE NOTICE that the undersigned counsel will take the oral deposition of Defendant James W. Reed on Friday, November 16, 2007 beginning at 2:00 p.m. in the offices of Young Conaway Stargatt & Taylor, LLP, Brandywine Building, 1000 West Street, 17th Floor, Wilmington, Delaware 19801.

PLEASE TAKE NOTICE that the undersigned counsel will take the oral deposition *duces tecum* pursuant to Superior Court Civil Rule 30(b)(6)¹ of the designee of Defendant J.B. Hunt Transport, Inc. on Friday, November 16, 2007 beginning at 3:00 p.m., or immediately following the deposition of James W. Reed, in the offices of Young Conaway Stargatt & Taylor, LLP, Brandywine Building, 1000 West Street, 17th Floor, Wilmington, Delaware 19801.

Deponent should produce and be prepared to testify about the following:

¹ ***Duces Tecum:*** All evidence pertaining to the accident including, but not limited to, log books, notes, receipts, damage repair estimates, lost wage verification, driver's license, reports, papers, photographs, incident reports, personnel records, hiring, retention and employment records of Defendant James W. Reed, correspondence, memoranda, statements and any other documents generated by deponents or in the custody of deponents, relating to, referring to, or regarding the accident.

1. Copies of each liability insurance policy with all endorsements which were in effect on the date of this accident and which cover this claim.

2. The complete personnel file, driver qualification file, and/or any other file pertaining to Defendant James W. Reed in the possession of Defendant J.B. Hunt Transport, Inc., including any materials which refer or relate to: his job application; his contract; his previous employers for which he was an operator of a commercial motor vehicle; dates employed by previous employers and the reason for leaving such employment; his record as a driver for J.B. Hunt Transport, Inc.; his disciplinary file; traffic violations against him; records of complaints about his driving; past employment investigations; investigations of his past motor vehicle driving record; records showing that he was physically qualified to drive a commercial motor vehicle; and any motor vehicle accidents resulting in property damage or personal injuries involving Defendant James W. Reed.

3. All written or printed matter, including ledgers, notes, summaries, schedules, driver's logs, mileage reimbursements, bills of lading, delivery documents, destination information, expense logs including tolls and gasoline purchases, records of stops at weigh stations and inspection facilities, records of pre-trip and post-trip inspections of Defendant James W. Reed's truck, and records relating to Defendant James W. Reed's work schedule for the Defendant J.B. Hunt Transport, Inc. for the seven (7) day period immediately preceding and including the day of the accident.

4. Any handbook and/or instructions for drivers issued by Defendant J.B. Hunt Transport, Inc. which were in effect on or before the date of the accident.

5. Any computer generated messages among/between/to the Defendants for the seven (7) day period immediately preceding and including the day of the accident.

6. Records of all safety meetings for drivers conducted by J.B. Hunt Transport, Inc. for the three (3) year period prior to the accident and records of attendance by Defendant James W. Reed at such meetings.

7. Defendant J.B. Hunt Transport, Inc.'s policies and procedures, written or as established through training or custom, for the hiring, retention and firing of commercial vehicle operators whether said operators.

8. Defendant J.B. Hunt Transport, Inc.'s policies and procedures, written or as established through training or custom, for:

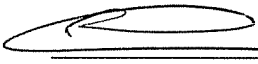
a. Driver safety procedures; and

b. Entering a roadway.

9. Any and all facts regarding the accident, including, but not limited to: Defendant J.B. Hunt Transport, Inc.'s investigation thereof; communication or contact with (or surveillance of) Plaintiff Joseph A. Cochran, Jr., Defendant James W. Reed and/or any witness, whether an eyewitness or post-event witness; accident scene inspection; vehicle inspection and/or repair; expert witness analysis; discipline or counseling of Defendant James W. Reed.

All Defendants' pleadings and responses to the Complaint, Interrogatories, and Requests for Production are incorporated herein by reference.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



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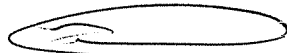
Dated: 10/22/07
cc: Wilcox & Fetzer

CERTIFICATE OF SERVICE

I, Timothy E. Lengkeek, hereby certify, on this 2nd day of October, 2007, that two copies of Notice of Depositions of Defendants were served upon the following counsel by Electronic

Filing and Hand Delivery:

TO: Delia A. Clark, Esquire
Rawle & Henderson LLP
300 Delaware Avenue, Suite 1015
Wilmington, DE 19801



Timothy E. Lengkeek (#4116)